## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

INDIGITECH, INC.,

Plaintiff,

v.

FIRST DATA MERCHANT SERVICES LLC, TELECHECK SERVICES, LLC, AND MONEY NETWORK FINANCIAL, LLC,

Defendants.

Civil Action No. 1:24-cv-00650-KMW-MJS

## STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME

Plaintiff Indigitech, Inc. ("Plaintiff") and Defendants First Data Merchant Services LLC, TeleCheck Services, LLC, and Money Network Financial, LLC ("Defendants"), through their undersigned counsel, stipulate and agree, subject to the Court's approval, as follows:

- 1. Plaintiff commenced this action on or about February 2, 2024, by filing a Complaint. (ECF No. 1.)
- 2. Defendants received process, consisting of Summons and the Complaint, on February 12, 2024. Accordingly, Defendants' deadline to answer, move, or otherwise respond to the Complaint is March 4, 2024.
- 3. Plaintiff and Defendants have agreed to an extension of time to allow Defendants a total of sixty (60) days from February 13, 2024, up to and including

Monday, April 15, 2024, to answer, move, or otherwise respond to Plaintiff's Complaint, and respectfully request the approval of this Court to do so.

- 4. No previous extensions have been obtained.
- 5. Defendants preserve all defenses and objections to the Complaint.

Respectfully submitted this 27th day of February 2024.

BLANK ROME LLP	POLSINELLI PC
/s Lauren Elizabeth O'Donnell	/s John C. Cleary
Lauren Elizabeth O'Donnell	John C. Cleary
300 Carnegie Center, Suite 220	(N.J. Bar No. 028482009)
Princeton, NJ 08540	600 Third Avenue, 42nd Floor
Telephone: (215) 569-5735	New York, NY 10016
Facsimile: (215) 832-5735	Tel.: (212) 413-2837
lauren.odonnell@blankrome.com	Fax: (212) 684-0197
	john.cleary@polsinelli.com
Counsel for Plaintiff Indigitech, Inc.	
	Counsel for Defendants First Data
	Merchant Services LLC, TeleCheck
	Services, LLC, and Money Network
	Financial, LLC
IT IS SO ORDERED THIS	day of,
2024.	
	Honorable Matthew J. Skahill
	United States Magistrate Judge

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 29, 2024, I served the foregoing Stipulation and Proposed Order to Extend Time on all counsel of record registered with the Court's ECF system, by electronic service via the Court's ECF transmission facilities.

s/ John C. Cleary
John C. Cleary